

Department of Public Works

Douglas S. Stack, P.E.

Director



March 6, 2012

Mr. Dave Woelfel
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3348

BY ELECTRONIC MAIL ONLY

Subject: Basin Plan Amendments to Revise Recreation Standards for Inland Fresh Surface Waters in the Santa Ana Region

Dear Mr. Woelfel:

The City of Tustin supports the adoption of the proposed Basin Plan Amendments to revise the recreation standards for inland fresh surface waters in the Santa Ana Region.

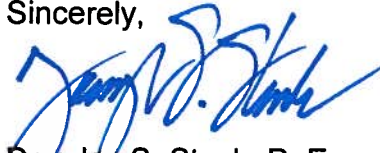
The City recognizes the efforts of the Stormwater Quality Standards Task Force to review the water quality standards related to swimming and recreational uses in the region's streams and rivers. Through a multi-year effort involving a wide range of stakeholders, the Task Force evaluated the science underlying water quality criteria for bacteria, conducted comprehensive evaluations of the ability of the region's water bodies to support swimming and other recreational uses, and considered a wide range of potential implementation options.

The City of Tustin believes that the proposed Basin Plan Amendments will help assure that human health will be protected within our region and that public resources will be expended reasonably and fairly. The Basin Plan Amendments update the region's water quality objectives for indicator bacteria to conform to the USEPA's recommended criteria, and the amendments incorporate a narrative objective to assure that waste discharges do not contain human pathogens at levels that will increase the risk of illness. The proposed changes recognize that some waters are commonly used for swimming and other recreational activities, while others are used infrequently, if at all. Finally, the proposed amendments acknowledge that recreational activities are unsafe in some streams during wet weather and regulate those streams accordingly.

The City of Tustin commends the Santa Ana Regional Board for its efforts with the Stormwater Quality Standards Task Force. This comprehensive effort has established a firm scientific foundation for much-needed changes to the Region's Basin Plan and has done so in a manner that is open and transparent.

We thank you for your consideration of our comments. Please contact Mr. Alex Waite at 714.573.3305 if you require additional information.

Sincerely,



Douglas S. Stack, P. E.
Public Works Director/City Engineer

c: Dana Kasdan, Engineering Services Manager
Doug Anderson, Transportation and Development Services Manager
Alex Waite, Environmental Compliance Specialist
Orange County Region 8 Permittees